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BESTFORD USA, Inc.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

LEVI STRAUSS & CO.,

Plaintiff,

v.

EVISU INTERNATIONAL S.R.L., *et al.*,

Defendant.

Case No. CV-10-1292 SI

**STIPULATION AND [PROPOSED]
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE
AND VACATING CASE
MANAGEMENT DATES**

**CMC Date: January 28, 2011
CMC Time: 3:00 p.m.**

1 Plaintiff Levi Strauss & Co. ("LS&Co.") and defendant Bestford USA, Inc. ("Bestford")
 2 jointly submit this Stipulation and Proposed Order.

3 LS&Co. and Bestford have continued their settlement discussions since the court-ordered
 4 mediation session on November 16, 2010, but have not been able to reach a resolution of this dispute.

5 LS&Co. is proceeding with Hague Convention service on defendant Bestford (Hong Kong)
 6 Limited. That process takes several months, and is not yet completed. Once Bestford (Hong Kong)
 7 has been served, it may file a motion to dismiss this action on jurisdictional or other grounds.

8 This matter is currently set for a further Case Management Conference on January 28, 2011.
 9 Under the Court's Civil Pretrial Minutes dated August 4, 2010, case management deadlines in this
 10 action stand as follows:

11	Fact Discovery Cutoff	January 28, 2011
12	Expert Designations	February 25, 2011
13	Expert Discovery Cutoff	April 15, 2011
14	Motions Hearing	June 10, 2011
15	Trial	July 25, 2011

16 The parties have served written discovery requests and notices of deposition. However, the
 17 parties are reluctant to proceed with discovery in light of the potential inclusion of an additional
 18 defendant, which could require duplication of depositions and other discovery.

19 In light of these facts and in the interests of judicial efficiency, the parties believe that the Case
 20 Management Conference set for January 28, 2011 should be continued, all case management deadlines
 21 vacated, and a new case management schedule set upon service of Bestford (Hong Kong)'s answer or
 22 resolution of its motion to dismiss, if any.

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1 In addition, under the Court's order dated January 10, 2011, the deadline to effect service on
2 Bestford (Hong Kong) is January 30, 2011. The parties further request that this deadline be extended
3 an additional 30 days, or until March 1, 2011, by which time LS&Co. expects service to be complete.

4
5 DATED: January 24, 2011

Respectfully submitted,

6 By: /s/ Gia Cincone

Gia Cincone

7 KILPATRICK TOWNSEND AND STOCKTON LLP

8 Attorneys for Plaintiff

LEVI STRAUSS & CO.

9 DATED: January 24, 2011

10 By: /s/ Michael Goldberg

Michael Goldberg

11 PRYOR CASHMAN LLP

Attorneys for Defendant

12 BESTFORD USA INC.

13 IT IS SO ORDERED.

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15 DATED: _____, 2011



16 Hon. Susan Illston

United States District Judge

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18 The case management conference is set for 3/25/11 @ 3 p.m.
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